UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

ADAM	MBU	JNDU	JRE.
-------------	-----	------	------

	Plaintiff,	
V.		Civil Action No: 3:11-cv-489

FRIEDMAN & MACFADYEN, P.C., et al

Defendants.

PLAINTIFF'S MOTION FOR LEAVE TO FILE HIS FIRST AMENDED COMPLAINT

COMES NOW the Plaintiff, ADAM MBUNDURE, by counsel, and for the reasons more fully set forth in the contemporaneously filed Memorandum of Law, he moves the Court for leave to file his First Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2).

Respectfully submitted, **ADAM MBUNDURE**

By:	/s/	
-	Of Counsel	

Matthew J. Erausquin, VSB#65434
Janelle E. Mason, VSB#82389
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Rd., Ste. 600
Alexandria, VA 22314
(703) 273-7770 - Telephone
(888) 892-3512 – Facsimile
matt@claleglal.com
janelle@clalegal.com

Dale W. Pittman, VSB#15673
THE LAW OFFICE OF DALE W. PITTMAN, P.C.
The Eliza Spotswood House
112-A West Tabb Street
Petersburg, VA 23803
(804) 861-6000
(804) 861-3368 Facsimile
dale@pittmanlawoffice.com

J. Chapman Petersen, Esq., VSB # 37225 Kristi Cahoon Kelly, Esq., VSB #72791 SUROVELL ISAACS PETERSEN & LEVY PLC 4010 University Drive, 2nd Floor Fairfax, VA 22030 (703) 277-9774 (703) 591-9285 Facsimile jpetersen@smillaw.com kkelly@siplfirm.com

Leonard A. Bennett, VSB #37523 Susan M. Rotkis, VSB#40693 CONSUMER LITIGATION ASSOCIATES, P.C. 763 J. Clyde Morris Boulevard, Suite 1-A Newport News, Virginia 23601 (757) 930-3660 - Telephone (757) 930-3662 - Facsimile lenbennett@cox.net srotkis@clalegal.com

Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Andrew Biondi Sands Anderson, PC 1111 E. Main Street Suite 2400 P.O. Box 1998 Richmond, VA 23219 abiondi@sandsanderson.com

Cullen Dennis Seltzer Sands Anderson, PC 1111 E. Main Street Suite 2400 P.O. Box 1998 Richmond, VA 23219 cseltzer@sbandsanderson.com

Douglas Pendleton Rucker, Jr. 1111 E. Main Street Suite 2400 P.O. Box 1998 Richmond, VA 23219 drucker@sandsanderson.com

 $/_{\rm S}/$

Susan M. Rotkis, VSB# 40693
Attorney for the Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 - Facsimile
srotkis@clalegal.com